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February 13, 2023

VIA ECF

Hon. Jennifer H. Rearden
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Martin Handler, et al*, 23-cr-04

Dear Judge Rearden:

We represent Martin Handler in the above-captioned cases and respectfully write, on behalf of all defendants, to request an adjournment of Friday's conference until a date convenient to the Court the week of March 6 (other than Friday, March 10).

We make this request for multiple reasons. First, because all the defendants, as well as some of the attorneys, are Orthodox Jews and thus an in-person conference on Friday is particularly difficult for them. Second, because the government represented in their recent February 10, 2023, letter that they will likely be producing an additional, very large tranche of discovery at the end of this week and that it anticipates that it will then have "substantially complete[ed]" its Rule 16 discovery obligations. The defense believes that having some time for counsel to review that new discovery, (which is some of the most important discovery in the case) before the status conference, get a sense of how long it will take to review all of the discovery, and determine what documents the government still needs to produce to the defense, will all help make the status conference—at which the Court has indicated it wants to discuss scheduling in this case—significantly more productive. Finally, we respectfully request that the Court re-schedule the conference for the week of March 6 because some defense counsel will be attending the ABA White Collar Conference the week of February 27.

I have spoken to the U.S Attorney's Office and it consents to this request. All defendants consent to the exclusion of Speedy Trial time until the rescheduled court conference.

Respectfully,

/s/

Susan R. Necheles
Gedalia Stern

Cc: All counsel (via ECF)